TSD File Inventory Index

Date July 6, 2005

Initial DM Kennedy

Facility Name	Lehman & Haas (Reynolds)		
Facility Identification Number	OHD000724138		
A.1 General Correspondence A.1-A.13	1	B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status A.2	1	1 Correspondence	
1 Correspondence	4	2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment	4	C.1 Compliance - (Inspection Reports) See C.2	
3 Part A Application and Amendments	4	C.2 Compliance/Enforcement C.2	1
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	
5 Change Under Interim Status Requests		.2 Import/Export Notifications	
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents C.3(3)	3
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		1 RFA Correspondence	
2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		3 State Prelim. Investigation Memos	
1 Correspondence		4 RFA Reports	
2 Closure/Post Closure Plans, Certificates etc A.4-5	1	D.2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence D.2.1	1
1 Correspondence		2 RFI Workplan D.2.2(3) D.2.3	3
2 Reports		3 RFI Program Reports and Oversight D.2.4(2)	1
B.1 Administrative Record	1	4 RFI Draft /Final Report	2

Total - 28

5 RFI QAPP D.2.5	1	7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data Soil Sampling/Groundwater D.2.7 (5)	5	D.5 Corrective Action/Enforcement	
8 RFI Progress Reports D.2.8 (3)	3	1 Administrative Record 3008(h) Order D.5.1-D.5.2	1
9 Interim Measures Correspondence		2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists D.6.1	1
1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		1 Correspondence	
3 CMS Workplan		.2 Reports	
4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
7 Lab Data Soil-Sampling/Groundwater D.3.7	1	.2 Compliance and Enforcement G.1.2 (2)	2
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
1 CMI Correspondence		4 Ecological - Administrative Record	
2 CMI Workplan		5 Permitting	
3 CMI Program Reports and Oversight		6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		7 Corrective Action/Remediation Implementation	
5 CMI QAPP		8 Endangered Species Act	
6 CMI Correspondence		9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports

Comments

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
ayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6249

George V. Voinovich
Governor

May 8. 1991

RE: MORTON INTERNATIONAL. INC.
HAMILTON COUNTY
HAZARDOUS WASTE
OHD 000 724 138
GENERATOR

Mr. Glenn Shaaf
Morton International. Inc.
Specialty Chemicals Group
2000 West Street
Cincinnati. Ohio 45215-3421

Dear Mr. Shaaf:

On April 16 18. and 29. 1991. I inspected Morton International to determine compliance with all applicable state and federal hazardous waste laws. You and John Hanley accompanied me on the inspection as representatives of Morton International, Incorporated. Enclosed are copies of the completed Resource Conversation and Recovery Act (RCRA) Generator and Land Disposal Restrictions (LDR) checklists.

The violations found during my inspection are outlined below and are cited from the Ohio Administrative Code (OAC)

1) OAC 3745-66-74(A & B): Morton International must start to incorporate the times on all drum pad inspection logs. At a minimum. the logs must indicate the name of the inspector, the date and time of inspection, a notation of observations made. and the date and nature of any repairs or remedial actions. Start to incorporate the times on the main storage pad logs. Start to maintain logs for the two satellite accumulation areas and incorporate the items mentioned in this paragraph. Save these logs for three (3) years and perform all drum pad inspections weekly.

2) OAC 3745-52-34(C): Morton International had more than one 55-gallon drum located at a satellite storage area. Accumulation at these points must not exceed 55 gallons. Maintain 55 gallons of hazardous waste (or less than 55 gallons) at all satellite areas.

3) OAC 3745-65-33(A & B): Morton International is not currently maintaining inspection logs of emergency equipment. nor is all such equipment being inspected weekly. The equipment must be inspected and recorded as such on a weekly basis.

> Retain these logs for at least three (3) years. Emergency equipment is defined as all facility communications [sic] or alarm systems, fire protection equipment, spill control and decontamination equipment.

Submit documentation to this office no later than June 3, 1991, indicating compliance with these violations.

At this time, I have a log of the waste currently on your drum pad. I ask that you send this office all manifests regarding disposal of this waste. These manifests must especially contain the disposition of the non-hazardous waste that was labeled as hazardous on my first visit. Please send the signed copies you receive from your treatment, disposal or storage (TSD) facility.

I would also like to see Morton incorporate the accumulation date on the current hazardous waste sticker that has been conceived in-house. Currently, Morton utilizes a two-sticker method - one sticker with the words "Hazardous Waste", and another sticker with the accumulation start date.

Morton International was evaluated under 40 CFR 261.24 for compliance with the new Toxicity Characteristic Rule. No violations were noted. USEPA will be notified as the State of Ohio does not have jurisdiction over this ruling.

Failure to cite specific violations within this correspondence does not relieve Morton International, Incorporated from complying with all applicable state and federal regulations, nor does it preclude this Agency from citing these violations in the future.

Please call me at this office if you have any questions or comments.

Sincerely,

Mark Boden
Division of Solid and Hazardous
Waste Management

MB:nys

Enclosure

cc: Laurie Stevenson, RCRA Enforcement, DSHWM, CO

RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: Morton International

USEPA I.D.: OHD 000 724 138 HWFB No.: NA

Street: 3000 West Street

City: Cincinnati State: Ohio Zip: 45215

County: Hamilton Telphone: (513) 733-2132

Owner/Operator: Morton International Incorporated

Street: 3000 West Street

City: Cincinnati State: Oh Zip: 45215

Telephone: (513) 733-2132

Inspection Date: April 16, 18, 21 1991 Time: 1:00 - 4:00 pm

Advance notice of inspection given? (yes) ____ (no) ✓

If so, how far in advance? ____

	Name	Agency/Title	Phone
Inspectors:	Mark Bodeau	OEPA/Env. Eng.	(513) 285-6357
Facility Representative:	Glenn Shaaf	Morton/Mgr. - HS&E	(513) 733 2132
	John Hawley	Morton/S.A. - E&S	(513) 733 2127

STATUS

Cond. Exempt SQG ___ SQG ___ Large Quantity Generator X

LDR Checklist Attached: (yes) ____ (no) ____

ACTIVITIES

Containers X
Tanks ___
Wastepile ___
Landfill ___
Surface Impoundment ___
Used oil burner ___
Hazardous waste fuel burner/blender ___
Incineration/Thermal treatment ___
Land treatment ___
Groundwater monitoring ___

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handing procedures:

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE | ON SITE MANAGEMENT | OFF SITE MANAGEMENT

EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR			TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT
			LESS THAN 90 DAYS	LESS THAN 180 DAYS	LESS THAN 270 DAYS									

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

   (yes) _____ (no) ✓

   If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

   (yes) _____ (no) ✓

   If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

   OR;

   b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

   (yes) ✓ (no) _____

   If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11) Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A)(B) and (C)? Y

   If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04? N

   If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06? N

   If so, please identify these waste streams below:

	Y/N/NA	RMK #
4. Is the generator recycling any materials on-site by:		
a. Using or reusing the material as an ingredient in an industrial process to make a product?	N	
i. If so, is the material being reclaimed before it is used or reused?	NA	
b. Using the material as a substitute for commercial products?	N	
c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?	N	
i. If so, is the material reclaimed before returning to the original process?	NA	

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?	N	

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the Land Disposal Restriction Checklist.	Y	

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?	Y	

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?	Y	

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57 AND OAC 3745-52-60)	Y/N/NA	RMK #
9. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 through 3745-52-57 and 3745-52-60?	NA	

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)	Y/N/NA	RMK #
10. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:		
a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32]?	Y	
b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32?	Y	
c. The generator meets the requirements for proper DOT placarding or offers the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?	Y	

REMARKS - PRETRANSPORT REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23) Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:

   a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20(A)? Y

   b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? Y

   c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E)? Y

   d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A)(1)(2)? Y

2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter? Y

   a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42? NA

3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? Y

REMARKS - MANIFEST REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34) Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection? N

   If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] NA

   Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

	Y/N/NA	RMK #
1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A)(4)]	Y	
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A)(4)]	Y	
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A)(4)]	Y	
4. Does the generator keep all the records required by 3745-65-16(D)(E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)]	Y	

REMARKS - PERSONNEL TRAINING REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56) Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52(A)(B)(C)(D)(E)]:

   a. Actions to be taken by personnel in the event of an emergency incident? Y

   b. Arrangements or agreements with local or state emergency authorities? Y

   c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y

   d. A list of all emergency equipment including location, physical description and outline of capabilities? Y

   e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y

2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y

3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] Y

4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y

5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] Y

	Y/N/NA	RMK #
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?	Y	

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]	Y	
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	Y	1
a. If yes, was the contingency plan implemented? [3745-65-51(B)]	Y	
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]		
a. Internal alarm system?	Y	
b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
c. Portable fire control equipment, spill control and decontamination equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]	N	
a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?	N	
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]	Y	
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]	Y	
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [OAC 3745-65-37(B)] NA

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

1) They've had at least 2 explosions and/or otherwise releases. Dan Kerstenbay did respond to one. Details are sketchy.

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS (OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

   a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A)(3)] — Y
   b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A)(2)] — Y

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? — N

   If so, OAC 3745-52-34(A)(1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

   If the generator is accumulating hazardous waste(s) in tanks, complete the Storage and Treatment in Tanks checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days? — N

   a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days? — NA

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

Y/N/NA RMK #

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation) — Y

   If so, are the following requirements of OAC 3745-52-34(C) being met:

   a. Quantities of waste accumulated do not exceed 55 gallons at any time? — N
   b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? — Y
   c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container? — Y

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b? — Y

   a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and; — N

   b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating? — Y

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)	Y/N/NA	RMK #
1. Are hazardous wastes stored in containers which are:		
a. Closed? [3745-66-73(A)]	Y	
b. In good condition? [3745-66-71]	Y	
c. Compatible with wastes stored in them? [3745-66-72]	Y	
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]	Y	
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]	Y	
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]	N	
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:		
a. Date and time of inspections?	N	
b. Name of inspector?	N	
c. Notation of observations made during the inspection?	N	
d. The date and nature of any repairs or other remedial action?	N	
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,	Y	
a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Y	
b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]	Y	

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Morton International Inc.

U.S. EPA ID No.: OHD 000 724 138

Street: 2000 West St.

City: Cincinnati Ohio State: Oh Zip: 45215

Telephone: (513) 733-2132

Inspection Date: 4/16/91 Time: 2:07 (am/pm)

Weather Conditions: Sunny, Mild

	Name	Agency/Title	Telephone
Inspectors:	Mark Roten	OEPA / Env Sp	(513) 285-6357
Facility Representatives:	Glenn Shaff	Morton / Adm.	(513) 733-2132
	John Hurley	Morton / Adm.	733-2107

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	____	____	____	____	____
F020-F023 and F026-F028	____	____	____	____	____
California List*	____	____	____	____	____
First Third [40 CFR 268.10]	____	____	____	____	____
Second Third [40 CFR 268.11]	____	____	____	____	____
Third Third [40 CFR 268.12]	____	____	____	____	____

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Morton makes chemical components for the PVC pipe (plastic pipe) industry.

LDR Waste Management:

All wastes are shipped off under contract to various TSD's around the Nation. Manifests are accompanied by an LDR form

Summary:

Morton exhibits very professional paperwork. All phases of Hazardous waste Mgmt. are smoothly run, with the exception of the drum pad areas.

Signature:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. **List waste codes which the facility handles in each of the following LDR categories*:**

1. F001 through F005 spent solvents: F003, F005

2. F020-F023 and F026-F028 dioxin-containing wastes: _____

3. California List Wastes (See Appendix A): _____

4. First Third Wastes [40 CFR 268.10]: _____

5. Second Third Wastes [40 CFR 268.11]: _____

6. Third Third Wastes [40 CFR 268.12]**:
D001, D002, D003, D004, D005, D006, D008, D010, D011 U239, U196

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. **Waste Code Determination**

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ✓ No ___

If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____
_____	_____

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristi[illegible] [40 CFR 268.9(a)]

Yes ✓ No ___ NA ___

Comments ___

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments ___

C. **Does the facility handle the following wastes (national capacity variances)?**

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List ___

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List ___

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List ___

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List ___

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List ___

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ✓ No ___ List D004, D008, D009

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ___ No ___ NA ___

   If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F003	___	✓
F005	___	✓
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

   Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

   Yes ___ No ___ NA ✓

   If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

   Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

      Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No ___ NA ___

c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ✓ NA ___

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
____	_____	__/__/__
____	_____	__/__/__
____	_____	__/__/__

Comments_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
____	_____	_____	_____
____	_____	_____	_____
____	_____	_____	_____

Comments_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

_____

_____

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)] Test results attached

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.).

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ✓

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments Drums labeled haz & stored >90 days, turned out not to be haz.

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ___ No ✓ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ✓ No ___ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
U234	Ross Incineration
D003 D005	Ecolotec
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ✓ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ✓ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ✓ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling argreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ✓ No ___ NA ___

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ✓ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ___ No ✓ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ___ No ___

Comments ____ _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ___ NA ___

(If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

5HW-13

7 SEP 1983

OHD000724138

Mr. Sebastian Sperber
Research Assistant
INFORM
381 Park Avenue South
New York, New York 10016

Re: Freedom of Information Act Request
(5)RIN-453-83

Dear Mr. Sperber:

This is in response to your letter dated August 8, 1983, and to your telephone conversations with Ms. April Katsura of my staff. On August 23, 1983, you came to our office to review files on eight facilities. The facilities and files are identified on the enclosed list.

At the same time, you were provided with copies of portions of the files. There was no charge for search time or duplicating because of INFORM's status as an established, public interest group.

You also requested to see the files of four other facilities. These facilities were not identified as being in our computer system. Therefore, we were unable to provide those requested files.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Eight facilities on the enclosed list
Ohio Environmental Protection Agency

bcc: ✓ Notification/Part A files
Ann Brash, OPA
Carol Kavcic, WMD

List of Enclosures

American Cyanamid Co. Marietta Plant 1405 Greene Street P.O. Box 388 Marietta, OH 45750 OHD004341509	N, A, C
Monsanto Co. River Road Rt. 50 Addyston, OH 45001 OHD004233003	N, A, C
Carstab Corp. 1560 West Street Cincinnati, OH 45215 OHD000724138	N, A, C
Sherwin-Williams Co. Hyde Park Plaza 3816 Paxton Ave. Cincinnati, OH 45209 OHD000806364	N
Sherwin-Williams Co. Cherry Grove Plaza 564 Ohio Pike Cincinnati, OH 45230 OHD000806356	N
Sherwin-Williams Co. Western Hills Shpg. Ctr. 6024 Glenway Ave. Cincinnati, OH 45211 OHD000817734	N
Sherwin-Williams Co. 10488 Chester Rd. Cincinnati, OH 45215 OHD095198479	N
Frank Enterprises, Inc. 700 Rose Ave. Columbus, OH 43219 OHD052860624	N

N = Notification of Hazardous Waste Activity
A = Application for a Hazardous Haste Permit--Part A
C = Compliance/Inspection File

OhioEPA

Re: Hamilton County
Hazardous Materials
Carstab Corporation
OHD 000724138

Dr. Raymond Phillips
Carstab Corporation
West Street
Cincinnati, Ohio 45215

April 19,1983

Dear Dr. Phillips:

On April 18, 1983 I conducted an ISS inspection of your facility to determine compliance with Ohio and Federal hazardous waste regulations. During the inspection I was accompanied by yourself and Mr. Mike Padgett. I inspected Carstab for compliance with generator regulations only, as Carstab has ceased TSDF activities and has requested withdrawal from TSDF status in October of 1982.

At the time of inspection I found Carstab to be in noncompliance with the following regulations:

1.	40 CFR 262.34(a)(3) OAC 3745-52-34	Each container must be labeled or marked with the words, "Hazardous Waste" while such hazardous waste is being accumulated on-site.
2.	40 CFR 265.35 OAC 3745-65-35	Adequate aisle space must be maintained to allow for the unobstructed movement of personnel and emergency equipment.

Please correct the above violations within 30 days, at which time I will conduct a re-inspection to determine Carstabs compliance.

If you have any questions or if I may be any help, please feel free to contact me at this office.

Sincerely,

Bruce A. Midolo

Bruce A. Midolo
Hazardous Materials Management

BAM:lmr

cc: Paula Cotter, DHMM, CO
cc: Ken Westlake, USEPA, Region V

Southwest District Office
7 East Fourth Street, Dayton, Ohio 45402-2086

4-25 [redacted] 1300
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 05-31-0227

PART I. GENERAL INFORMATION

U.S. EPA I.D. # OHD000784133

Facility: CARSTAB Corp. Address: WEST STREET City: CINCINNATI

State: OHIO Zip Code: 45215 County: HAMILTON Telephone: (513) 733-2100

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	RAYMOND PHILLIPS	MATERIALS MANAGER	(513) 733-2100
2.	MIKE PADGETT	MANAGER TRAFFIC, MAT. HANDLING	(513) 733-2100
3.			

INSPECTOR(S)

1.	BRUCE MEDALO	ENVIRONMENTAL ENGINEER	(513) 461-4670
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- [X] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [ ] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- [ ] General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- [ ] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/ Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

Revised 9/15/82

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	✓			(1)
2. If "yes", is it complete and accurate?			✓	
3. Has the facility submitted a Part B?		✓		(2)

REMARKS, PART I. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

(1) SENT LETTER TO USEPA (COPIED OHIO EPA), IN OCT, 1982, REQUESTING CARSTAB'S STATUS BE CHANGED FROM TSDF TO GENERATOR

(2) PART B WAS CALLED BUT DID NOT SUBMIT PENDING STATUS CHANGE

- MANUFACTURE CHEMICAL ADDITIVES FOR PLASTICS AND PETROLEUM INDUSTRIES

F001, F003, F004, F005, D001, D002, D005, D009, U154

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?		✓		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).		✓		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	✓			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)			✓	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	✓			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.			✓	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".		✓		
b) The date that accumulation began is clearly marked on each container.	✓			
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	✓			
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	✓			

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			city
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	✓			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	✓			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)		✓		one aisle was obstructed
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)	✓			
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)	✓			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)	✓			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.			✓	

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓			
b) In good physical condition (265.171)	✓			
c) Compatible with the wastes stored in them (265.172)	✓			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓			
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓			
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c)	✓			

OhioEPA

Re: Carstab Corporation
U.S. EPA ID No. OHD000724138
Ohio EPA ID No. 05-31-0227

January 24, 1983

RECEIVED
JAN 26 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

Mr. Joe Mazzei
Carstab Corporation
1560 West Street
Reading, Ohio 45215

Dear Mr. Mazzei:

On January 4, 1983, representatives from this agency met with officials from Carstab to discuss the Findings & Orders issued by Director Nichols on December 1, 1982. Those orders concerned the abatement of a chemical leachate which is entering Mill Creek from Carstab's property.

At that time, the Carstab representatives present noted their exception to these orders since, taken literally, they did not allow for a "no action" alternative if it could be demonstrated that this leachate was not adversely impacting the stream. In return for our withdrawal of the Findings & Orders, Carstab agreed to fully cooperate in a more detailed evaluation of the leachate problem and agreed to respond within thirty days of receipt to our request for any currently available information concerning this problem.

To this end, the Ohio EPA prepared new Findings & Orders necessary to revoke the original set. That revocation was finalized last week, subsequent to Carstab's withdrawal of its appeal to the Environmental Board of Review.

In order that our mutual efforts to resolve this problem not be affected by this administrative delay, I am forwarding our request for information at this time. As agreed, we expect your response to each of the specific requests below within thirty days of your receipt of this letter. In so doing, please provide:

1. A complete copy of the hydrogeological study prepared by PEDCo for Carstab including all appendices and complete analytical reports on both leachate and groundwater samples;

2. Complete copies of any draft reports from PEDCo including all of the information requested above;

3. All raw analytical data available from both Carstab and PEDCo relative to analyses of groundwater, leachate and surface waters on and around the plant site including those data which qualify and quantify individual datum previously reported as totals (e.g., the identity and concentration of each compound previously reported under headings of acid extractable and base/ neutral extractable organics);

4. A summary of all past on-site disposal practices including the volumes, chemical constituents and concentrations of each, time periods and the disposal method and disposal location for each waste stream disposed of at carstab;

5. The pertinent history of the site including changes of ownership, the dates when any disposal facilities -- including disposal or treatment lagoons, pits, ponds or on-site burial facilities -- were constructed, placed in or taken out of service and the dates when each of those facilities was backfilled or otherwise closed and the method of closure;

6. A complete history of the types and volumes of materials produced or packaged at the plant from the date of initial operation to present, indicating the time periods associated with each and the types, volumes and chemical constituents of each associated waste stream and the means and facility used to dispose of each such waste.

The information requested above should be addressed to Mr. Thomas M. Ontko, Hazardous Materials Management Unit, Ohio Environmental Protection Agency, Southwest District Office, 7 East Fourth Street, Dayton, Ohio 45402. Where any of the requested information is not available or cannot be provided within thirty days, the reason why it is unavailable or not provided should be explained and, in the latter case, the earliest date by which the information can be provided should be specified. I appreciate your expressed desire to cooperate on this matter, but must remind you that your failure to provide an adequate and timely response to this request will force us to reinitiate such legal action as is deemed appropriate, including a possible immediate referral to the Ohio Attorney General.

Should you have any questions concerning this request, please feel free to contact Mr. Ontko at (513) 461-4670.

Very truly yours,

Rex N. Sprague, P.E.
Acting Director

RNS/maf
81440.0

cc: Tom Ontko, SWDO
Rich Shank, DHMM
Sid Stern, Legal
Kathy Homer, USEPA, Region V
R. Joseph Parker, Esq., Taft, Stettinius and Hollister
Chuck Wilhelm, Chief, DHMM

OhioEPA

Re: Hazardous Waste Activity Status
U.S. EPA I.D. No. OHD000724138
Ohio Permit No. 05-31-0227

April 1, 1985

Dr. Raymond Phillips
Materials Manager
Carstab Corporation
West Street
Cincinnati, Ohio 45215

Dear Dr. Phillips:

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours,

Thomas E Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V
HWFB
D.O.

Re: Director's Final Findings and Orders
Carstab Corporation
U.S. EPA I.D. No. OHD000724138
Ohio EPA I.D. No. 05-31-0227

January 12, 1983

Raymond Phillips, Materials Manager
Carstab Corporation
1560 West Street
Reading, Ohio 45215

Dear Mr. Phillips:

Enclosed please find a copy of Director's Final Findings and Orders made and issued pursuant to the Ohio Revised Code Section 6111.03 (H). The specific reasons for the action are indicated in the Order.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
250 E. Town St.
Room 101
Columbus, Ohio 43215

Very truly yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Permits & Manifest Records Section
Division of Hazardous Materials Management

TEC/bsr

cc: Charles J. Wilhelm, Chief, DHMM
Sidney Stern, Staff Attorney, Legal Section
Kathy Homer, U.S. EPA, Region V
Rich Shank, DHMM
Dave Strayer, SWDO, DHMM

Is nce Date: January 12, 1983

Effective Date: January 12, 1983

BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

Carstab Corporation 1560 West Street Reading, Ohio 45215	:	Director's Final Findings and Orders

Pursuant to the Ohio Revised Code Section 6111.03(H), the Director of the Ohio Environmental Protection Agency hereby makes the following Findings and issues the following Orders:

FINDINGS

1. On December 1, 1982, Final Findings and Orders were issued to Carstab Corporation, Reading, Ohio, which required the company to comply with certain orders contained therein.

2. On January 4, 1983, representatives of Ohio EPA met with representatives of Carstab to discuss the Findings and Orders and to clarify any points which remained unclear relating to the Orders.

3. As a result of that meeting, the Ohio EPA has agreed to provide Carstab with a list of questions to be answered and Carstab has agreed to furnish all materials and data required to answer the said list of questions. OEPA will provide the list by January 15, 1983 and Carstab will produce the information by February 15, 1983.

ORDERS

1. The Findings and Orders issued to Carstab Corporation on December 1, 1982 are hereby revoked.

Wayne S. Nichols
Director

Date January 7, 1983

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

JAN 12 1983

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Diana Davis Date 1/12/83

OhioEPA

Re: Carstab Corporation
TSDF Reinspection
05-31-0227

May 4, 1982

Carstab Corporation
Raymond Phillips
Materials Manager
West Street
Cincinnati, Ohio 45215

Dear Dr. Phillips:

On April 30, 1982 I reinspected your facility for correction of the two deficiencies which I noted during my February 22, 1982 inspection. These deficiencies were lack of adequate aisle space in the drum storage and lack of daily inspections of a hazardous waste storage tank. Both deficiencies were adequately corrected.

Thank you for your time and consideration. If you have any questions, please call me at this office.

Sincerely,

Randall Marshall

Randall Marshall
Environmental Scientist
Hazardous Materials Management

RM:lmp

cc: Paula Cotter, DHMM, CO
cc: Bob Fragale, HWFAB, CO
cc: Kathleen Homer, USEPA, Region V

RECEIVED
MAY 7 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

OhioEPA

Re: Director's Final Findings and Orders
Carstab Corporation
U.S. EPA I.D. No. OHD000724138
Ohio EPA I.D. No. 05-31-0227

December 2, 1982

Raymond Phillips, Materials Manager
Carstab Corporation
1560 West Street
Reading, Ohio 45215

Dear Mr. Phillips:

Enclosed please find a copy of Director's Final Findings and Orders made and issued pursuant to the Ohio Revised Code Section 6111.03(H). The specific reasons for the action are indicated in the Order.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
250 E. Town Street
Room 101
Columbus, Ohio 43215

Very truly yours,

James F. Flautt

James F. Flautt, Supervisor
Permit Data Management Unit
Permits & Manifest Records Section
Division of Hazardous Materials Management

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Diana Davis Date 12/2/82

JFF/bsr

cc: Charles J. Wilhelm, Chief, DHMM
Sidney Stern, Staff Attorney, Legal Section
Kathy Homer, U.S. EPA, Region V
Rich Shank, DHMM
Dave Strayer, SWDO, DHMM

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

DEC 2 1982

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Sarah Davis Date 12/1/82

Issue Date: Dec. 1,1982
Effective Date: Dec. 1,1982

BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

DEC 1 1982

In the Matter of:

Carstab Corporation
1560 West Street
Reading, Ohio 45215

Director's Final Findings and Orders

Pursuant to the Ohio Revised Code Section 6111.03(H), the Director of the Ohio Environmental Protection Agency hereby makes the following Findings and issues the following Orders:

FINDINGS

1. Carstab Corporation, a subsidiary of Thiokol Corporation, (hereinafter referred to as "this entity") owns and operates a manufacturing facility located at 1560 West Street, Reading, Ohio 45215. This facility produces chemical additives for use in the plastics and petroleum industry.

2. Incidental to these manufacturing operations, this entity generates a variety of industrial wastes as that term is defined in Section 6111.01, Ohio Revised Code. Several of these industrial wastes are also defined as hazardous wastes pursuant to Section 3734.01, Ohio Revised Code.

3. This entity has, in the past, disposed of quantities of these industrial wastes on the premises of their manufacturing facility.

4. On June 9, 10 and 18, 1980, the Ohio Environmental Protection Agency (Ohio EPA) made a series of subsurface borings at this entity's facility as part of an investigation into possible sources of a chemical leachate which was observed entering Mill Creek from several locations along the stream bank at the west edge of this entity's property. Based upon laboratory analyses of groundwater and leachate samples collected, the investigation concluded that the presence of subsurface wastes at this entity's facility was the cause of this leachate.

5. On July 30, 1980, the Ohio EPA requested that this entity conduct such additional hydrogeological investigations at their facility as were necessary to locate, identify and further characterize the source(s) of pollutants present beneath their property and to determine to what extent the subsurface wastes previously disposed of at the facility were migrating from the site. The Ohio EPA also requested that these additional investigations conclude by recommending remedial or mitigative measures which this entity could implement to prevent any further off-site migration of these pollutants.

6. Subsequent hydrogeological studies performed by this entity concluded that there are at least two areas on their property which contain significant quantities of subsurface wastes, that these wastes have entered the groundwater and that these wastes are migrating via a lens of sand and gravel to appear as leachate where that lense outcrops on the stream bank. From this area, the leachate freely enters Mill Creek. Constituents of the waste include aniline, toluene, chlorobenzene and 1,2 dichlorobenzene, and arsenic, chromium and lead compounds.

7. Both the groundwater and Mill Creek are defined as waters of the state pursuant to Section 6111.01, Ohio Revised Code.

8. Section 6111.04, Ohio Revised Code, prohibits any person from placing any industrial waste in a location where they enter waters of the state and declares any such action to be a public nuisance except in such cases where the Director of the Ohio Environmental Protection Agency has issued a permit to allow such action. That section also prohibits any person to whom such a permit has been issued from causing to be placed in waters of the state any industrial waste in excess of the permissive discharges specified in that permit.

9. This entity has never applied for nor been issued a permit as required by Section 6111.04, Ohio Revised Code, and the wastes currently entering the stream contain pollutants are of such type and quantity as would exceed the permissive discharge limits in any permit which might be issued should the appropriate application be made.

10. This entity is therefore responsible for maintaining a public nuisance which must be eliminated in order to properly safeguard the environment and protect the public health and welfare.

11. It is technically feasible and economically reasonable for this entity to comply with the following orders.

ORDERS

1. This entity shall, within 60 calendar days of the effective date of these Orders, complete such additional studies as are necessary to determine the extent to which wastes from their property are migrating off-site and recommend remedial measures sufficient to prevent such off-site migration to Mill Creek and groundwater. Those studies should include, but not necessarily be limited to, the identification of all areas where wastes are or have been buried on the property, an estimation of the types and quantities of waste in each of those areas and information concerning the migration rate and direction of travel of those wastes, and analysis of sediment in Mill Creek. The proposed remedial measures may address each area separately or the entire site as a whole.

2. A detailed report of these studies, including general construction drawings of the recommended remedial measures, shall be prepared and submitted, in triplicate, to the Ohio EPA, Southwest District Office, 7 East Fourth St., Dayton, Ohio 45402, within 75 calendar days of the effective date of these Orders.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Vivian Davis Date 12/1/82

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

DEC 1 1982

3. After the report required by Order No. 2 has been reviewed and approved by the Ohio EPA, this entity shall construct those facilities which are identified as necessary to prevent the off-site migration of wastes. This construction shall proceed on a schedule acceptable to the Ohio EPA and it shall be this entity's responsibility to obtain any permits which may be required prior to initiating that construction.

4. In order to implement Order No. 3, above, after the Ohio EPA has reviewed the report submitted by this entity and approves the proposed mitigative action as to concept, these Orders shall be modified to include a schedule for the construction of the required control facilities. That schedule shall include elements for the submission of any applications for any permits which must first be obtained from this Agency.

Wayne S. Nichols
Director

Nov 30, 1982
Date

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

DEC 1 1982

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Dwight Davis Date 12/1/82

Re: TSDF Inspection - Carstab Corporation

Carstab Corporation
Raymond Phillips
Materials Manager
West Street
Cincinnati, Ohio 45215

March 9, 1982

Dear Mr. Phillips:

On February 22, 1982 I inspection your facility for compliance with the Ohio and Federal Hazardous Waste Laws and Regulations concering permitted hazardous waste storage and treatment facilities. Michael Padgett and you represented Carstab Corporation during the inspection. I have enclosed the completed inspection form with this letter.

During the inspection I found your facility to be in substantial compliance with the current hazardous waste rules except for inadequate aisle space in your drum storage area (3745-55-35 O.A.C. or 265.35 C.F.R.), and lack of documented daily inspections of your storage tank (3745-56-74 O.A.C. or 265.194 C.F.R.). According to your March 1, 1982 letter you have no monitoring equipment to inspect in relation to this tank, but the requirement is for daily inspections including cutoff and tank level.

Please correct these deficiencies as soon as possible. I will schedule a reinspection in about 30 days.

Please send me a copy of your contingency plan as soon as convenient. If you have any questions, please call me at this office.

Sincerely,

Randall Marshall

Randall Marshall
Hazardous Materials Section

RM/mmg

cc: Kathy Homer
cc: Paula Cotter, DHMM, C.O.
cc: Bob Fragale, HOFAB, C.O.

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD000724138

Facility: Carstab Corp. Address: West St. City: Cincinnati

State: Ohio Zip Code: 45215 County: Ham. Hon Telephone: 513-733-2100

Facility Operator: Raymond Phillips Title: Materials Manager Telephone: 513-733-2100

Facility Owner: Thiokol Corp. Address:

City: Newtown State: Penn. Zip Code: 18940 Telephone: 215-968-5911

Type of Ownership: ✓ Private ____ Government State HWFAB No. 81-HW-0227

Date of Inspection: 2/22/82 Time of Inspection: (Start) 10:15 a.m. (Finish) 12:30 p.m.

Advance Notification? ___ No ✓ Yes:

Weather Conditions: cloudy, 40°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Raymond Phillips, PhD	Materials Manager	513-733-2100
2.	Michael D. Padgett	Manager of Traffic and Mat. Handling	513-733-2100
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Randall Marshall	Environmental Scientist / O.E.P.A.	513-461-4670
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ____ Generation B. ✓ Storage C. ✓ Treatment
   D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):
   a) Listed Wastes: U154, F001, F003, F004, F005
   b) Non-Listed Wastes: ✓ D001 I ✓ D002 C ____ D003 R ____ D000 T

3. Has this facility submitted a Part A Permit Application? ✓ Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?
   ____ Yes, See Remark # ____ ✓ No

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	√			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?		√		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	√			#1
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	√			
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	√			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	√			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	√			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	√			

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ✓ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ✓ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Manufacture chemical additives for plastics and petroleum industries

REMARKS, PART 1. (GENERAL INFORMATION)

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓			
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.			✓	
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.			✓	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.			✓	
8. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			✓	
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.				

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.				
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).				
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.				
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.				
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).				
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).				
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).				
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	√			
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	√			

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			√	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

#1 - Enclosed tank is used for the separation of organics for inorganics for disposal to MSD. Organics are toluene and acetic acid

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	√			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	√			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	√			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	√			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	√			
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	√			

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	√			
a) Inspect emergency equipment.	√			
b) Inspect monitoring equipment.	√			
c) Inspect security, alarm and communications devices.	√			
d) Inspect process equipment (pipes, pumps, etc.).	√			
e) Inspect containment structures (dikes, curbs, etc.).	√			
f) Inspect facility for structural malfunctions (roof, floor, etc.).	√			
g) Inspect hazardous waste handling/loading areas each day used.	√			
h) Record of any malfunctions due to equipment or operator errors.	√			
i) Record of any hazardous waste discharges.	√			
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	√			
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	√			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	√			

	Yes	No	N/A	Remark #
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).		✓		
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	✓			

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	✓			

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	√			
b) Physical separation of incompatible waste materials.			√	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	√			
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.			√	

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		√		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	√			
a) Internal alarm system	√			
b) Access to telephone, radio or other device for summoning emergency assistance.	√			
c) Portable fire control equipment.	√			
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	√			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	√			
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	√			

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	√			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	√			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			√	

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	√			
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	√			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	√			
c) The estimated (or actual) weight, volume or density of the waste material(s).	√			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	√			

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	√			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).				
g) Records of any waste analyses and trial tests required to be performed.				
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).				
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.				
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.				
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.			√	

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			√	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).				

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.				
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.				

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	✓			
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.			✓	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			✓	

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	___	___	√	___
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	___	___	√	___
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	___	___	___	___
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	___	___	___	___
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	___	___	___	___

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	___	___	___	___
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	___	___	___	___
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	___	___	___	___
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	___	___	___	___

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.				

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	✓			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	√			
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	√			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	√			
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	√			

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	√			
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.			√	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	√			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	√			
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	√			
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).			√	

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).				
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).				

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	✓			

Subpart J: Storage in Tanks

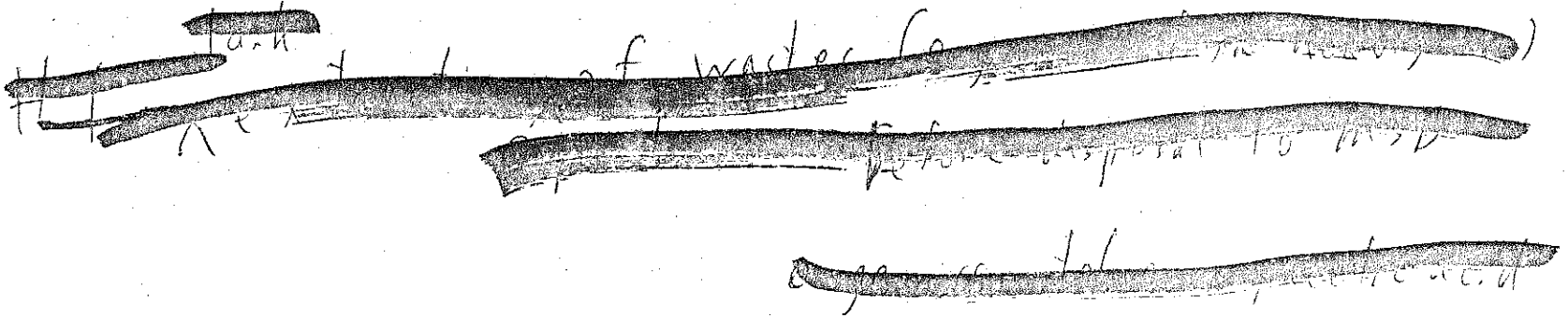
	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	✓			
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).			✓	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).		✓		
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	✓			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).			✓	
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.				
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.				

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft.
101 to 1,000.....	380 m	1,250 ft.
1,001 to 10,000.....	530 m	1,730 ft.
10,001 to 30,000.....	690 m	2,260 ft.

Subpart Q: Chemical, Physical and Biological Treatment

	Yes	No	N/A	Remark #
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	√			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	√			
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	√			
4. Are inspection procedures followed according to 265.403?			√	#3 not in use for sometime
5. Are the special requirements fulfilled for ignitable or reactive wastes?	√			
6. Are incompatible waste treated? (If yes, 265.17(b) applies.)		√		

NOTE: EPA HAS TEMPORARILY SUSPENDED THE APPLICABILITY OF THE REQUIREMENTS OF THE HAZARDOUS WASTE REGULATIONS IN 40 CFR PARTS 122, 264 AND 265 TO OWNERS AND OPERATORS OF (1) WASTEWATER TREATMENT TANKS THAT RECEIVE, STORE, AND TREAT WASTEWATERS THAT ARE HAZARDOUS WASTE OR THAT GENERATE, STORE OR TREAT A WASTEWATER TREATMENT SLUDGE WHICH IS A HAZARDOUS WASTE WHERE SUCH WASTEWATERS ARE SUBJECT TO REGULATION UNDER SECTIONS 402 OR 307(b) OF THE CLEAN WATER ACT (33 U.S.C. 1251 ET SEQ.) AND (2) NEUTRALIZATION TANKS, TRANSPORT VEHICLES, VESSELS, OR CONTAINERS WHICH NEUTRALIZE WASTES WHICH ARE HAZARDOUS ONLY BECAUSE THEY EXHIBIT THE CORROSIVITY CHARACTERISTIC UNDER 40 CFR 261.22 OR ARE LISTED AS HAZARDOUS WASTES IN SUBPART D OF 40 CFR PART 261 ONLY FOR THIS REASON.



Remark #2 - Not in use for some time.

Re: Application No.: 81-HW-0227
Hamilton County

September 14, 1981

Raymond Phillips, Materials Manager
Carstab Corporation
1560 West Street
Cincinnati, Ohio 45215

Dear Mr. Phillips:

On March 3, 1981, Bill Barrow of the Ohio Environmental Protection Agency conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Carl Adams.

Enclosed is a copy of the report completed when your facility was inspected. This form illustrates those areas inspected at your facility for compliance with Interim Status Standards.

The following is a list of items found to be in violation of current regulations or those areas which will be covered by regulations not yet effective. The capital letter codes found to the left of each item are explained on the last page of the enclosed inspection form.

CODE	PAGE NO.	ITEM	
B	2	III.(F)1	Special handling?
S		IV.(A)1	Is there any evidence of fire, explosion, or release of hazardous waste?
B	3	IV.(F)	Are arrangements with local authorities included in the Operating Record?
B	5	VII.(C)	Does the facility maintain an operating record at the site?
B	5	VII.(D)	Are all records available at the site for inspections?

A	5	VIII.(A)4	Is closure cost estimate available by May 19, 1981?
A	5	VIII.(B)	Has owner or operator supplied a post closure monitoring plan (by May 19, 1981)?
B	6	III.(B)4	Name, Address and EPA I.D. number of designated permitted facility and alternate facility.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Materials Management

PF:bsr

cc: Kathleen Homer, U.S. EPA
Bill Barrow, SWDO

CERTIFIED MAIL

OHD000724135
EPA IDENTIFICATION NUMBER

AUG 21 1981

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: CARSTAB CORP.

(B) Street: 1560 WEST ST.

(C) City: CINN. (D) State: OH (E) Zip Code: 45215

(F) Phone: 513-554-1554 (G) County: HAMILTON

(H) Operator: RALPH BINNS, PRES.

(I) Street: SAME

(J) City: (K) State: (L) Zip Code:

(M) Phone: (N) County:

(O) Owner: THIOKOL CORP

(P) Street: P.O. BOX 1000

(Q) City: NEWTOWN (R) State: PENN (S) Zip Code: 18940

(T) Phone: 215-968-5911 (U) County:

(V) Type of Ownership: ___ Federal ___ Municipal ✓ Private ___ State ___ County

(W) Date of Inspection: 3/31/81 (Q) Time of Inspection (From) 2:00 (To) 5:00

(X) Weather Conditions: SUNNY, 75°

Person(s) Interviewed	Title	Telephone
RAY PHILLIPS	MAT. M. R. PLANT ENG.	SAME
CARL ADAMS		"
GLEN SHARF	DIR. IND. ENG.	"
MIKE TADLOCK	TRAF. MAT. HANDLING	"
(Z) Inspection Participants	Title	Telephone
BILL BARROW	HAZARDOUS WASTE SCIENTIST	573-461-467

II. Description of Site Activity

(A) ✓ Generator (Form 2)

(B) ____ Transporter (Form 3)

(C) N.A. Chemical, Physical and Biological Treatment (Form 4)

(D) ✓ Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) N.A. Land Treatment (Form 4) RDF 9/14/81

(H) ____ Thermal Treatment (Form 7)

(I) Comments: MANUFACTURE PASTIC STABILIZERS, CUTTING FLUIDS, LAND DISPOSAL PRIOR TO 1980

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	✓			

III. GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Rem Number
Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?				NA
2. Transfer of Ownership?				NA
General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			NA - ✓	(1)
Security - Do security measures include:				
1. 24-Hour Surveillance?	✓			
2. Artificial or Natural Barrier Around Facility?	✓			
3. Controlled Entry?	✓			
4. Danger Sign(s) at Entrance?	✓			
Do Owner or Operator Inspections Include:				
1. Records of Malfunctions?	✓			
2. Records of Operator Error?	✓			
3. Records of Discharges?	✓			
4. Inspection Schedule?	✓			
5. Safety, Emergency Equipment?	✓			
6. Security Devices?	✓			
7. Operating and Structural Devices?	✓			
8. Inspection Log?	✓			

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles?	✓			
2. Description of Training?	✓			
3. Records of Training?	✓			
Is Personnel Training Completed within the Required Time Frame?	✓			
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?				
1. Special Handling?		✓		
2. No Smoking Signs?	✓			
3. Separation and Confinement?	✓			

IV. PREPAREDNESS AND PREVENTION

	Yes	No	Not Inspected	See Remark Number
(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?	✓			(2)
(B) Does the Facility have the Following Equipment:				
1. Alarm System?	✓			
2. Telephone or 2-Way Radios?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

Units: WATER – 4000 gal/min.

	Yes	No	Not Inspected	See Remark Number
(C) Testing and Maintenance of Emergency Equipment:				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	✓			(3)
2. Is Emergency Equipment Maintained in Operable Conditions?	✓			
(D) Has Owner or Operator Provided Immediate Access to Internal Alarms (if needed)?	✓			
(E) Is there Adequate Aisle Space for Unobstructed Movement?	✓			
(F) Are Arrangements with Local Authorities Included in the Operating Record?			✓	(4)

VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(A) Does the Contingency Plan Contain the Following Information:

1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)	✓			
2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §264.37?	✓			

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
4. A list of all emergency equipment at the facility which includesthe location and physical description of each item on the list and a brief outline of its capabilities?	✓			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)	✓			
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?	✓			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	✓			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
(D) Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?				(5)

VII. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	✓			
2. Are records of past shipments retained for 3 years?			✓	
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?			✓	
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?				
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?				

VIII. CLOSURE AND POST CLOSURE

	Yes	No	Not Inspected	See Remark Number
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	✓			
2. Has this plan been submitted to the Regional Administrator?	✓			
3. Has Closure begun?		✓		
4. Is closure cost estimate available by May 19, 1981?		✓		
(B) Post Closure Care and Use of Property - Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?		✓		(6)

OHD000 2224
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection

AUG 21 1981

I. General Information:

(A) Installation Name: CARSTAB CORP.

(B) Street: WEST ST

(C) City: CINN. (D) State: OH (E) Zip Code: 45215

(F) Phone: 513-554-1554 (G) County: HAMILTON

(H) Operator: Ralph Burns Pres

(I) Street: Same

(J) City: (K) State: (L) Zip Code:

(M) Phone: (N) County:

(O) Owner: Mineral Corp

(P) Street: P.O. Box 1000

(Q) City: Newtown (R) State: Penn (S) Zip Code: 1897

(T) Phone: 215-968-5911 (U) County:

(V) Type of Ownership: ____ Federal ____ Municipal ✓ Private ____ State ____ County

(W) Date of Inspection: 5/13/81 Time of Inspection (From) ____ (To) ____

(X) Weather Conditions:

Person(s) Interviewed	Title	Telephone

(Z) Inspection Participants	Title	Telephone

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) ____ Transporter (Form 3)

(B) N.A. Chemical, Physical and Biological Treatment (Form 4)

(C) ✓ Storage (Form 5)

(D) ____ Landfill (Form 6)

(E) ____ Incineration (Form 7)

(F) ____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available?	✓			
(B) Does the Manifest contain the following information:				
1. Manifest document number?	✓			
2. Name, mailing address, telephone number, and EPA ID Number of Generator?	✓			
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?		✓		
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required Certification?	✓			
8. Required Signatures?	✓			
(C) Does the Owner or Operator Submit Exception Reports when Needed?				N/A

IV. PRE-TRANSPORT REQUIREMENTS

	Yes	No	Not Inspected	See Remark Number
(A) Is Generator Packaging waste in accordance with DOT Regulations?	✓			
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?	✓			
If required, are placards available to transporter?	✓			

	Yes	No	Not Inspected	See Remark Number
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?		✓		
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?		✓		
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	✓			
4. Are wastes stored in tanks managed according to the following:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	✓			
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				NA
c. Do continuous feed systems have a waste-feed cutoff?				NA
d. Are required daily and weekly inspections done?	✓			
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requi em nts?		NA		(14)
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	✓			

			Inspected	Number
5. If hazardous wastes cumulate on site, does the generator follow the following general facility standards?				(15)
A Do Personnel training records include:				
1. Job Titles?	✓			
2. Description of Training?	✓			
3. Records of Training?	✓			
Is Personnel Training Completed within the Requried Time Frame?	✓			
B. Prepardness and Prevention				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
2. Does the Facility have the following equipment?				
a. Alarm system?	✓			
b. Telephone or 2-Way Radios?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control

Units: WATER 4000 GPM

3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	✓			
b. Is emergency equipment Maintained in Operable Condition?	✓			

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	✓			
5. Is there adequate Aisle Space for unobstructed Movement?	✓			
6. Are arrangements with local authorities included in the operating record?	✓			
(C) Contingency Plan and Emergency Procedure				
1. Does the contingency plan contain the following:				
a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)	✓			
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?	✓			
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.	✓			
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	✓			

	Yes		Not Inspected	See Remar Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?	✓			
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?	✓			
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?				(5)

V. RECORDKEEPING

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?	✓			

VI. INTERNATIONAL SHIPMENTS

(A) Has the Installation Imported or Exported Hazardous Waste?		✓		
(If A was answered Yes, then complete one or both of the following)				
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the				

	Yes	No	Not Inspected	See Remark Number
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?				

VII. PREPARER INFORMATION

Name: BILL BARROW

Title: HAZARDOUS WASTE SCIENTIST

Phone Number: ~~713~~ 461-4670

REMARKS: ① Waste streams are not individually analyzed; however streams are marked as to process of origin ② Several leaking drums, due to warm tides — water running off into storm drain. Leachate runoff from buried lagoons ③ Inspected unloaded, no inspection log ④ Have verbal comm. with fire dept., nothing in operating record ⑤ They say no situation of this type has occurred ⑥ Post closure plan not required at time of inspection, should address monitoring of ground water and run-off ⑦ Buried lagoons contribute to [illegible] high conc. of heavy metals (As) plastic & solvents, etc. to be effectively stabilized ⑨ Run-off from lagoons, storage [illegible] ⑩ no records of ~~[illegible]~~ waste [illegible] area

⑪ should have monitoring plan for the buried lagoons.

12. monitoring plan doesn't add [illegible]
13. used to bury incompatible waste/do not mix

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment

AUG 21 1981

I. General Information

A) Facility Name: CERSTAR CORP.

B) Street: WEST ST

C) City: CINN (D) State: OH (E) Zip Code 45215

F) Phone: 513-554-1554 (G) County: HAMILTON

N.A. R.D.F 9/14/81

II. Chemical, Physical and Biological Treatment (Subpart Q)

(not necessary - no treatment in tanks)

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?				NA
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	✓			
4. Are inspection procedures followed according to 265.403?	✓			
5. Are the special requirements fulfilled for ignitable or reactive wastes?	✓			
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)				NA

* III. Land Treatment (Subpart M) N.A. R.D.F. 9/14/81

	Yes	No	Not Inspected	See Remark Number
1. Is hazardous waste capable of biological or chemical degradation?		✓		(8)
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?		✓		(9)
3. Is waste analysis according to 265.273?		✓		(10)
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?.				NA
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?		✓		(11)
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?		✓		(12)
7. Are records kept regarding application dates and rates, quantities, and location of all hazardous waste placed in the facility?		✓		
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes?		✓		
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies.)				(13)

* This section filled out for reference only. Facility has had problems with closed lagoons/groundwater JF

OHD000724138
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

AUG 21 1987

I. General Information

A) Facility Name: CARSTAB CORP.

B) Street: WEST ST

C) City: CINN (D) State: OH (E) ZIP Code 45215

F) Date of Inspection: 513-554-1554

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT INSPECTED	REMARK #
1. Are containers in good condition?	✓			
Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?				(9)
5. Are containers inspected weekly for leaks and defects?				
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	✓			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	✓			

B. Facilities which store hazardous waste in tanks (Subpart J)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				NA

Continued on next page 14

	YES	NO	NOT INSPECTED	REMARK #
Do continuous feed systems have a waste-feed cutoff?				NA
Are waste analyses done before the tanks are used to store a substantially different waste than before?	✓			
5. Are required daily and weekly inspections done?	✓			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	✓			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				NA

C. Facilities which store hazardous waste in surface impoundments (Subpart K)

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

D. Facilities which store hazardous waste in waste piles (Subpart L)

1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
Are piles of reactive or ignitable waste protected?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				

KEY TO CODED ITEMS (COLUMN IV)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 12 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

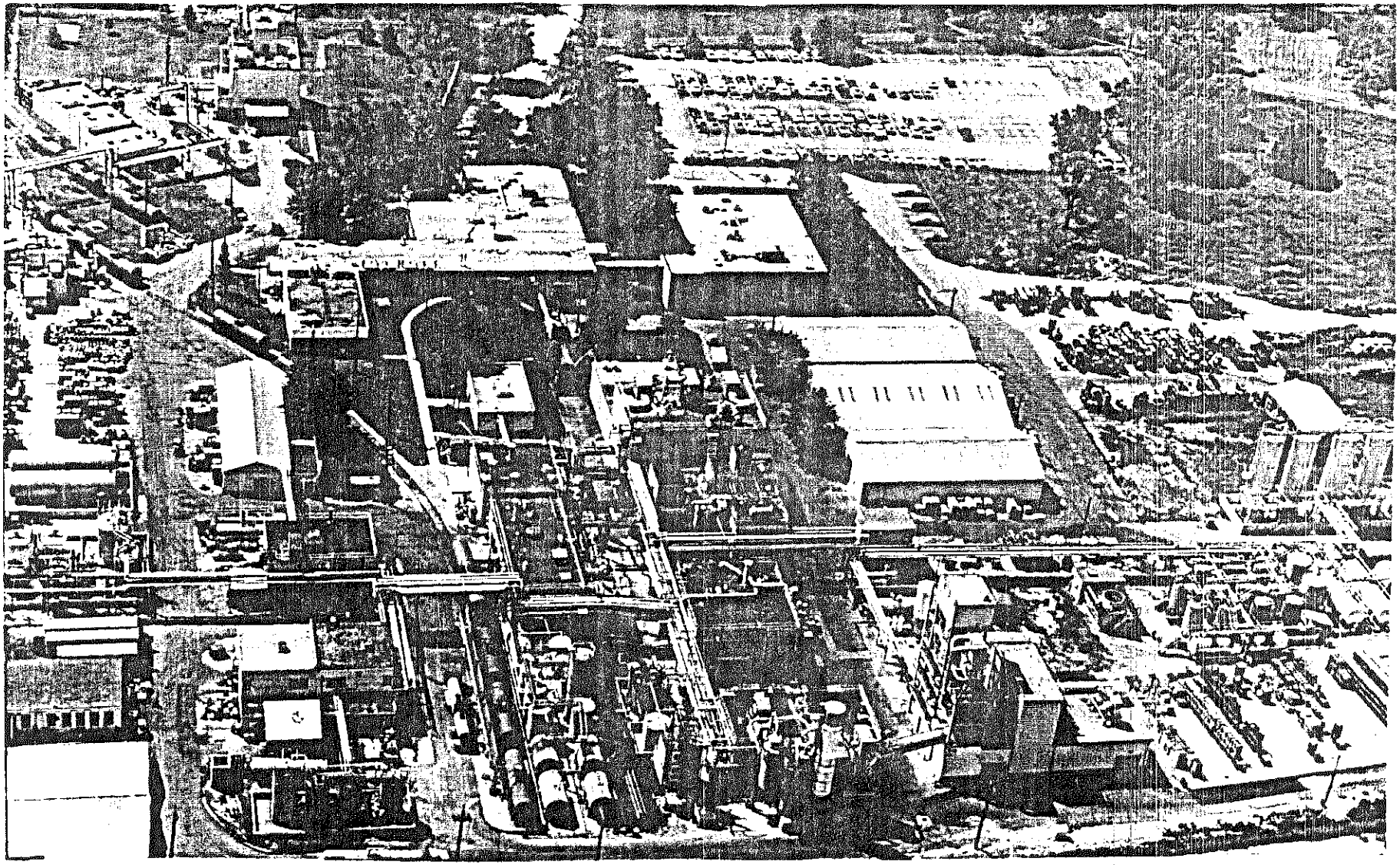
F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.

S. Several leaking drums were observed due to warm temperatures and wastes were running off-site into storm drains. This condition must be resolved immediately to assure no off-site migration of wastes.

HAZARDOUS WAST. ERMIT APPLICATION

FORM 3 RCRA ITEM VI



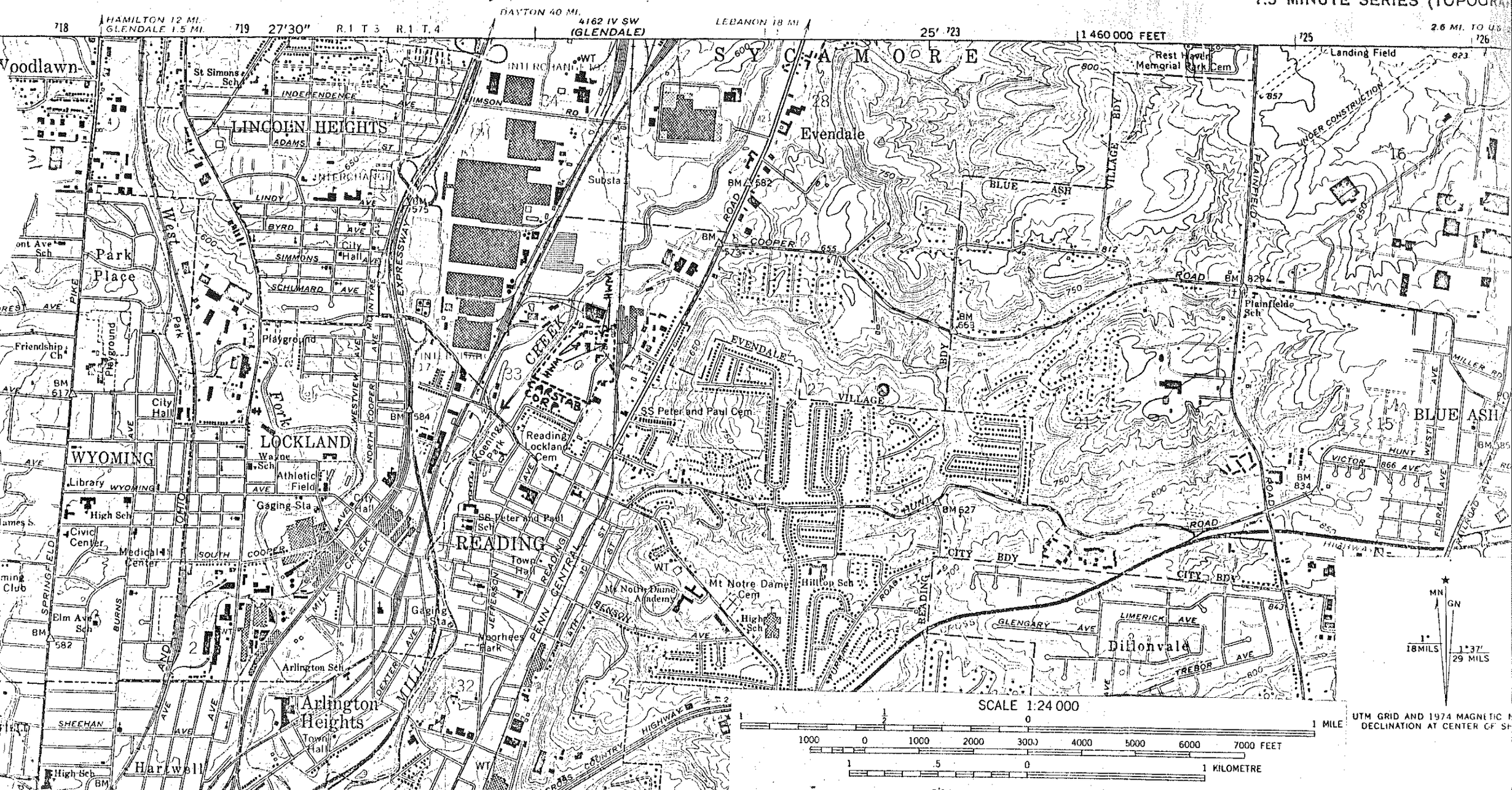
CARSTAB CORPORATION

EPA I.D. NUMBER OHD004250726

EPA CONSOLIDATED PERMITS PROGRAM
APPLICATION FORM 1-GENERAL
INFORMATION ITEM XI

LOCATION MAP
CARSTAB CORPORATION
READING, OHIO

I.D. NUMBER
OHD004250726



(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F 0HD000724138 D

LABEL ITEMS

I. EPA I.D. NUMBER: 0HD004250726

III. FACILITY NAME: ~~CINCINNATI MILACRON CHEMICALS~~

V. FACILITY MAILING ADDRESS: WEST STREET, CINCINNATI, OH 45215

VI. FACILITY LOCATION: WEST STREET, CINCINNATI, OH 45215

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge to waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges to waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge to waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP CARSTAB CORPORATION

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
PHILLIPS RAYMOND MATERIALS MGR	513 733 2220

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX:

B. CITY OR TOWN: | C. STATE: | D. ZIP CODE:

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER:

B. COUNTY NAME: HAMILTON

C. CITY OR TOWN: | D. STATE: | E. ZIP CODE: | F. COUNTY CODE (if known):

NOV 17 1980

EPA Form 3510-1 (6-80)

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2869 (specify) INDUSTRIAL ORGANICS	2843 (specify) SURFACE ACTIVE AGENTS
C. THIRD	**D. FOURTH**
2865 (specify) CYCLIC INTERMEDIATE DYES	(specify)

VIII. OPERATOR INFORMATION

A. NAME

CARSTAB CORPORATION

B. Is the name listed in Item VIII-A also the owner? ☑ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL M = PUBLIC (other than federal or state)
S = STATE O = OTHER (specify)
P = PRIVATE

P (specify)

D. PHONE (area code & no.)

A 513 733 2100

E. STREET OR P.O. BOX

WEST STREET

F. CITY OR TOWN

CINCINNATI

G. STATE

OH

H. ZIP CODE

45215

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	**D. PSD** (Air Emissions from Proposed Sources)
9 N	9 P
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
9 U	9 (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

ENGAGED IN THE MANUFACTURE OF ADDITIVES FOR THE PLASTICS & PETROLEUM INDUSTRY.

MINOR PORTION OF PRODUCTS SUPPLIED TO TEXTILE, PAPER AND MISCELLANEOUS INDUSTRIES.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
RALPH S. BINNS - PRESIDENT	Ralph S. Binns	NOVEMBER 13, 1.

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

163

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZ[illegible]S WASTE PERMIT APPLICATI(
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S F OHD000724138 T/A 1 C

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C 8 | YR. 49 | MO. 12 | DAY 15 | (APPROXIMATION)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	350,000	G	
	T01	59,000	U	
3	S02	17,000	G	
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES O ... SCRIBING OTHER PROCESSES *(code "T0* ... ACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic or toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL	
S W	OHD000724138 A C 1	S W	DUP T/A C 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D002	800	T	S01	
2	D001	175	T	S01 S02	
3	D001	100	T	S01	
4	D002				INCLUDED WITH ABOVE
5	U154	75	T	S01	
6	F005	60	T	S01 T01	
7	D003	40	T	S01 T01	
8	F005	10	T	S01	
9	D002				INCLUDED WITH ABOVE
10	F003	400	P	S01	
11	F001	100	P	S01	
	F004	10	P	S01	
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL S CODES FROM ITEM D(1) ON PAG

EPA I.D. NO. *(enter from page 1)*

F OHD000724138 T/A 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
39 14 00 N	84 25 30 W

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Ralph S. Binns	Ralph S. Binns	November 13, 1980

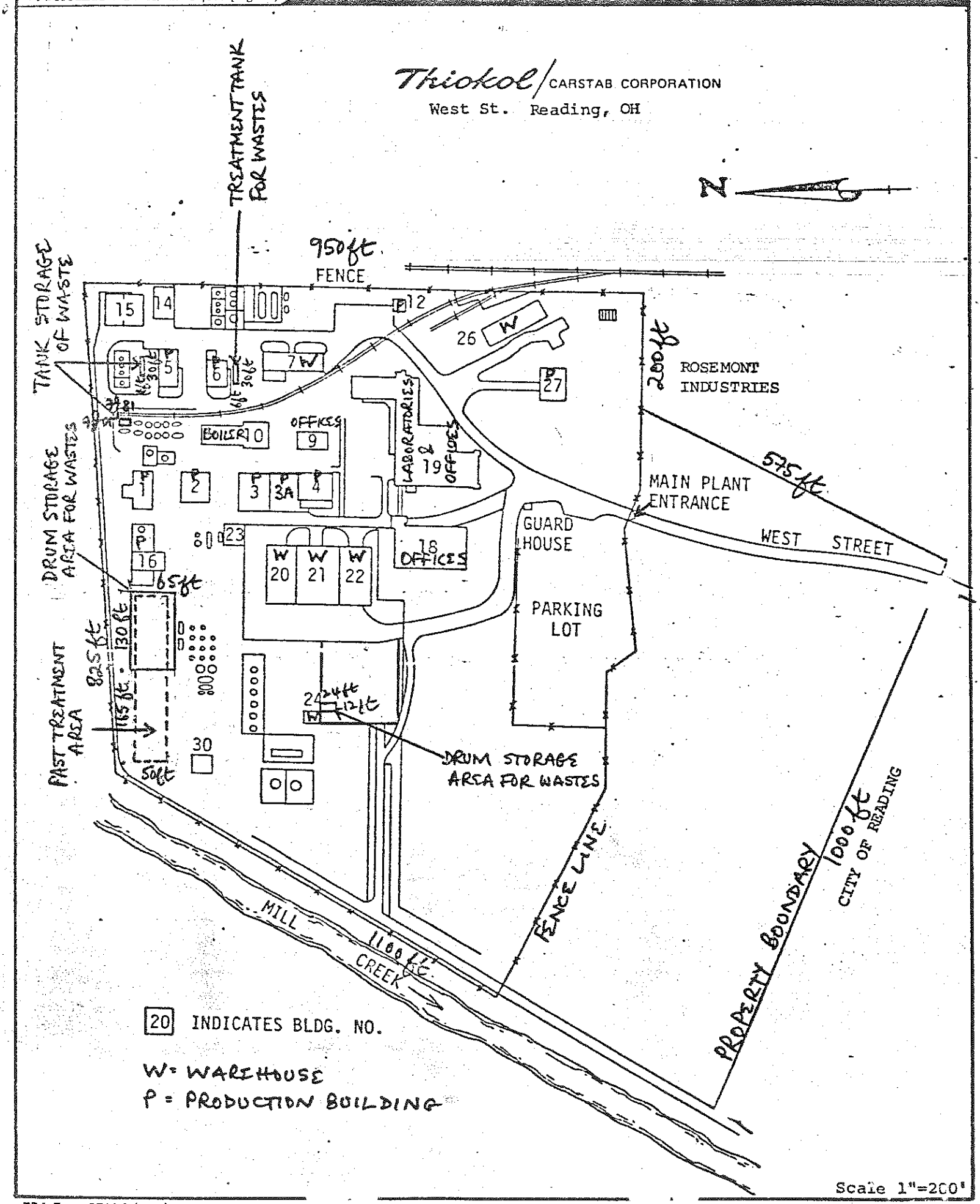
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*



Ca-tab Corp

OhioEPA Inter-Office Communication

TO: Don Schwaderer, Deputy Director **DATE:** November 3, 1981

FROM: Michael Dalton, Geologist through Kenneth Schultz

SUBJECT: Thiokol/ Carstab Corporation

In 1979 two of Emergency Response's personnel discovered a serious leachate problem along the east bank of Mill Creek in Reading, Ohio. A preliminary investigation by myself along with Miles Datesman indicated the problem was due to one of three sources; Pristine, Cincinnati Drum Service, or Cincinnati Milacron. At the time we were concerned with the surface runoff and did not pursue the leachate problem.

In June, 1980 Emergency Response was contacted by ex-employees of Cincinnati Milacron, which had been purchased by Thiokal/Carstab Corporation. These employees alledged that a large number of chemical drums had been buried on the property. While we were meeting the employees in order to obtain detailed information, they contacted the media. Several articles were run in local papers with "scare" headlines.

On June 6, 1980 I met with Carstab officials and inspected the plant and grounds. During this inspection I was shown a map which had locations of chemical drums marked on it. Later I used a metal detector to try and confirm the presence of the drums and did find one large area with a strong reading. This area conincided with the locations of an old, filled-in lagoon which the ex-employees had said was used for drum disposal.

On June 9, 10, and 18 I drilled a total of five holes to groundwater. In four of the five holes the ground water was black and had a strong odor. Samples of this water were sent to ODH for snalysis (see attached lab reports) Further investigations indicated the source of the contamination to be lagoons on the Carstab property that had been used for years for acid neutralization and disposal.

A meeting was held with Thiokal/Carstab officials on July 30 at which the company was requested to hire a hydrogeologic consulting firm. The consultant was to determine the extent of the contamination and a method of controlling or removing it. The company officials were told to proceed expeditously with the investigation as there was a great deal of concern about possible contamination of the Reading well field.

We did not receive any further information from the company until late October, 1980 when they sent the proposal for the study prepared by Pedco Environmental. At the time, I felt that the company was not cooperating and should be put under Findings and Orders. It was decided to let Pedco proceed and issue Findings and Orders based on their proposal. We anticipated the study would be completed in January or February 1981 and that any necessary construction would be completed before summer 1981.

I attemped to contact company officials in early summer to ascertain why we had not received the completed report and a proposal for control. The people I contacted were evasive and claimed they were coordination with other Ohio EPA personnel. Neither Bill Barrow, Miles Datesman, or Ken Harsh had been contacted by the company and Barrow had experienced the same problem I had. Therefore, I sent the attached letter on September 28, 1981.

Thiohol/Carstab's reply is totally ridiculous. It does not take over one year to do a simple, limited hydrogeologic study. I believe the company is attempting to delay in the hopes that the problem will take care of itself. My second attached letter is intended to be a lead-in to Findings and Orders to be issued in late November with completion of a control system set for Spring 1982.

MD/cs

cc: Rich Shenk
Chuck Wilhelm
David Strayer
Jim Crawford
Ken Schultz

Ohio Department of Health

Sanitary Chemistry Section

Environmental Sample Submission Report

Agency: OEPA

Division Program: Emergency Response

Analysis Reported To: ☑ CO ☐ CDO ☐ SE ☐ NE ☐ SW ☐ NW

Laboratory: ☐ Central ☐ SE ☐ NE ☐ SW ☐ NW

Sample Number: 32650

Analyst: _____ Supervisor: Sullivan

Date Received: 6/30/80

Date Reported: 8-5-80

Sample Identification

Station: Carstab Chemical

ID Number: SC, _ _ _ _ _ _ _ _ _ _,

Address: _____

City: Reading Zip: _____

County: Hamilton Phone: _____

Collected By: Michael Dalton

Grab Sample Date or Beginning Date of Composite Sample—Use Military Time

Year	Month	Day	Hour	Minute
8 0	0 6	1 8	1 6	0 0,

Ending Date of Composite Sample—Use Military Time

Year	Month	Day	Hour	Minute	CVT	S/T	TYP

Field Treatment:

☐ Filtered ☐ $CuSO_4 + H_3PO_4$

☐ Iced ☐ H_2SO_4

☐ NaOH ☐ HNO_3

☐ Other (Explain) liquid fraction

Additional Information—Analyst Remarks—Non Routine Analytical Requests

Sample not prepared for metals

Not enough sample to run Na

(16)

☐ Sample Code	P115,	☐ Conductivity, Field, U-MHO	P94,	☐ Chlorine Total Resd mg/l	P50060,
☐ pH, Field S.U.	P400,	☐ Flow, Instantaneous CFS	P61,	☐ Water Temperature, Field	P10,
☐ Dissolved Oxygen, Field mg/l	P300,	☐ Hydrogen Sulfide mg/l	P71875,	☐ Sample Purpose	P71999,
☐ Stream Gage	P65,	☐ Chlorine Free Avl, Field mg/l	P50064,	☐	

Particular (indicate by checking boxes)		☐ Phosphorus Sol, P mg/l	P666,	☐ Lithium Total, Li ug/l	P1132,
☐ Turbidity FTU	P76,	☐ Phosphate Reactive P mg/l	P70507,	☒ Manganese Total, Mn ug/l	P1055, 42000
☐ Color Pt-Co	P80,	☒ Chloride, Cl mg/l	P940, 3600	☒ Mercury Total, Hg ug/l	P71900, —
☐ Conductivity at 25°C U-MHO	P95,	☐ Fluoride Total, F mg/l	P951,	☐ Molybdenum Total, Mo ug/l	P1062,
☐ pH, Lab S.U.	P403,	☐ Cyanide,CN mg/l	P720,	☐ Nickel Total, Ni ug/l	P1067,
☐ pH, $CaCO_3$ Stability S.U.	P70311,	☐ Silica, Diss. Si mg/l	P955,	☐ Selenium Total, Se ug/l	P1147,
☐ Alkalinity Total, $CaCO_3$ mg/l	P410,	☒ Calcium Total, Ca mg/l	P916, 2740	☐ Silver Total, Ag ug/l	P1077,
☐ Alkalinity Phth, $CaCO_3$ mg/l	P415,	☒ Magnesium Total, Mg mg/l	P927, 1380	☒ Strontium Total, Sr ug/l	P1082, 800
☐ Alkalinity $CaCO_3$ Stabl, mg/l	P74023,	☒ Sodium Total, Na mg/l	P929, 720	☐ Thallium Total, Tl ug/l	P1059,
☐ Acidity Total, $CaCO_3$ mg/l	P70508,	☒ Potassium Total, K mg/l	P937, 180	☒ Tin Total, Sn ug/l	P1102, <4000
☐ Acidity M.O. $CaCO_3$ mg/l	P436,	☒ Aluminum Total, Al ug/l	P1105, 154000	☐ Titanium Total, Ti ug/l	P1152,
☐ Hardness Total, $CaCO_3$ mg/l	P900,	☐ Antimony Total, Sb ug/l	P1097,	☐ Vanadium Total, V ug/l	P1087,
☐ Residue, Total mg/l	P500,	☒ Arsenic Total, As ug/l	P1002, 2400	☒ Zinc Total, Zn ug/l	P1092, 15200
☐ Residue, Total Volatile mg/l	P505,	☐ Barium Total, Ba ug/l	P1007,	☐ Carbon Total, Organic C mg/l	P680,
☐ Residue, Total Nfilt (Sus) mg/l	P530,	☐ Berylium Total, Be ug/l	P1012,	☐ Carbon Diss, Organic C mg/l	P681,
☐ Residue, Vol, Nfilt mg/l	P535,	☐ Bismuth Total, Bi ug/l	P1017,	☐ Phenol ug/l	P32730,
☐ Residue, Total Filt (Diss) mg/l	P70300,	☐ Boron Total, B ug/l	P1022,	☐ MBAS mg/l	P38260,
☐ Residue, Vol Filt mg/l	P520,	☒ Cadmium Total, Cd ug/l	P1027, <200	☐ Oil-Grease, Total mg/l	P556,
☐ Residue, Settlable ml/l	P545,	☒ Chromium Total, Cr ug/l	P1034, 1600	☐ BOD, 5-Day mg/l	P310,
☐ Sulfate, SO_4 mg/l	P945,	☐ Chromium Hex, Cr ug/l	P1032,	☐ COD mg/l	P335,
☐ Nitrogen TKN, N mg/l	P625,	☐ Cobalt Total, Co ug/l	P1037,	☐ TOD mg/l	P343,
☐ Nitrogen Ammonia, N mg/l	P610,	☐ Copper Total, Cu ug/l	P1042,	☐	
☐ Nitrite-Nitrite, N mg/l	P620,	☒ Iron Total, Fe ug/l	P1045, 216000	☐	
☐ Nitrite, N mg/l	P615,	☐ Iron Diss., Fe ug/l	P1046,	☐	
☐ Phosphorus Total, P mg/l	P665, AUG 1 1980	☒ Lead Total, Pb ug/l	P1051, 4800	☐	

Distribution: 1—Data Processing 2—Central Office 3—District Office 4—Owner 5—Laboratory

WCW 20

Ohio Department of Health

Sanitary Chemistry Section

Environmental Sample Submission Report

Agency: _____

sion Program: _____

alysis Reported To: ☐ CO ☐ CDO ☐ SE ☐ NE ☐ SW ☐ NW

Laboratory: ☐ Central ☐ SE ☐ NE ☐ SW ☐ NW

Sample Number: 32404

Analyst: _____ Supervisor: Sadowski

Date Received: 6-11-80

Date Reported: 9/2/1/80

Sample Identification

Station: Carstab Chemical well #3

ID Number: SC, — — — — — — — —,

Address: _____

City: Reading Zip: _____

County: Hamilton Phone: _____

Collected By: Michael Dalton

Grab Sample Date or Beginning Date of Composite Sample—Use Military Time

Year	Month	Day	Hour	Minute
8	0	0 6	1 0	1 7	3 0

Ending Date of Composite Sample—Use Military Time

Year	Month	Day	Hour	Minute	CVT	S/T	TYP

Field Treatment:

☐ Filtered ☐ $CuSO_4 + H_3PO_4$

☐ Iced ☐ H_2SO_4

☐ NaOH ☐ HNO_3

☐ Other (Explain) Calculate Hardness from Ca + Mg

TOC down for repair

Additional Information—Analyst Remarks—Non Routine Analytical Requests

Sample separated into a 50/50 solid/liquid. Sample shaken and diluted

☐ Sample Code	P115,	☐ Conductivity, Field, U-MHO	P94,	☐ Chlorine Total Resd mg/l	P50060,
☐ pH, Field S.U.	P400,	☐ Flow, Instantaneous CFS	P61,	☐ Water Temperature, Field	P10,
☐ Dissolved Oxygen, Field mg/l	P300,	☐ Hydrogen Sulfide mg/l	P71875,	☐ Sample Purpose	P71999,
☐ Stream Gage	P65,	☐ Chlorine Free Avl, Field mg/l	P50064,	☐	

gular (Indicate by checking boxes)		☐ Phosphorus Sol, P mg/l	P666,	☐ Lithium Total, Li ug/l	P1132,
☐ Turbidity FTU	P76,	☐ Phosphate Reactive P mg/l	P70507,	☒ Manganese Total, Mn ug/l	P1055, 16400
☐ Color Pt-Co	P80,	☒ Chloride, Cl mg/l	P940, 2580	☒ Mercury Total, Hg ug/l	P71900, 12.0
☐ Conductivity at 25°C U-MHO	P95,	☐ Fluoride Total, F mg/l	P951,	☐ Molybdenum Total, Mo ug/l	P1062,
☒ pH, Lab S.U.	P403, 7.2	☒ Cyanide,CN mg/l	P720, inTerf	☐ Nickel Total, Ni ug/l	P1067,
☐ pH, $CaCO_3$ Stability S.U.	P70311,	☐ Silica, Diss. Si mg/l	P955,	☐ Selenium Total, Se ug/l	P1147,
☐ Alkalinity Total, $CaCO_3$ mg/l	P410,	☒ Calcium Total, Ca mg/l	P916, 24000	☐ Silver Total, Ag ug/l	P1077,
☐ Alkalinity Phth, $CaCO_3$ mg/l	P415,	☒ Magnesium Total, Mg mg/l	P927, 10000	☒ Strontium Total, Sr ug/l	P1082, 46000
☐ Alkalinity $CaCO_3$ Stabl, mg/l	P74023,	☒ Sodium Total, Na mg/l	P929, 330	☐ Thallium Total, Tl ug/l	P1059,
☐ Acidity Total, $CaCO_3$ mg/l	P70508,	☒ Potassium Total, K mg/l	P937, 50	☒ Tin Total, Sn ug/l	P1102, 1000
☐ Acidity M.O. $CaCO_3$ mg/l	P436,	☒ Aluminum Total, Al ug/l	P1105, 65000	☐ Titanium Total, Ti ug/l	P1152,
☒ Hardness Total, $CaCO_3$ mg/l	P900, inTerf	☐ Antimony Total, Sb ug/l	P1097,	☐ Vanadium Total, V ug/l	P1087,
☐ Residue, Total mg/l	P500,	☒ Arsenic Total, As ug/l	P1002, 270	☒ Zinc Total, Zn ug/l	P1092, 10000
☐ Residue, Total Volatile mg/l	P505,	☐ Barium Total, Ba ug/l	P1007,	☒ Carbon Total, Organic C mg/l	P680, ———
☐ Residue, Total Nfilt (Sus) mg/l	P530,	☐ Berylium Total, Be ug/l	P1012,	☐ Carbon Diss, Organic C mg/l	P681,
☐ Residue, Vol, Nfilt mg/l	P535,	☐ Bismuth Total, Bi ug/l	P1017,	☒ Phenol ug/l	P32730, 450
☐ Residue, Total Filt (Diss) mg/l	P70300,	☐ Boron Total, B ug/l	P1022,	☐ MBAS mg/l	P38260,
☐ Residue, Vol Filt mg/l	P520,	☒ Cadmium Total, Cd ug/l	P1027, 250	☐ Oil-Grease, Total mg/l	P556,
☐ Residue, Settlable ml/l	P545,	☒ Chromium Total, Cr ug/l	P1034, 550	☐ BOD, 5-Day mg/l	P310,
☐ Sulfate, SO_4 mg/l	P945,	☐ Chromium Hex, Cr ug/l	P1032,	☒ COD mg/l	P335, 13300
☒ Nitrogen TKN, N mg/l	P625, 710	☐ Cobalt Total, Co ug/l	P1037,	☐ TOD mg/l	P343,
☐ rogen Ammonia, N mg/l	P610, 560	☐ Copper Total, Cu ug/l	P1042,	☐	
☐ te-Nitrite, N mg/l	P620, 14.	☒ Iron Total, Fe ug/l	P1045, 250000	☐	
☐ Nitrite,N mg/l	P615,	☐ Iron Diss., Fe ug/l	P1046,	☐	
☐ Phosphorus Total, P mg/l	P665,	☒ Lead Total, Pb ug/l	P1051, 250	☐	

Distribution: 1—Data Processing 2—Central Office 3—District Office 4—Owner 5—Laboratory

Ohio EPA Inter-Office Communication

TO: Don Schwaderer, Senior Deputy Director DATE: 7/17/80

FROM: Ken Harsh, Assistant Chief, Emergency Response

SUBJECT: Carstab sample results

We have received analytical results from a sample taken by Bill Barrow, OLPC, SWDO of material leaching into Mill Creek from a fill/gravel lens near and adjacent to the Carstab facility in Reading. Approximately 70-80 compounds have been identified in the leachate. The compounds in highest concentration are:

1. N,N-diethyl acetamide $(C_2H_5)_2CHCONH_2$ a moderately toxic combustible liquid which may be tetratogenic or neoplasmic (LD_{50} rat) 910 mg/kg.

2. Aniline, which has high toxicity and is a suspected Carcinogen and is toxic. $C_6H_5NH_2$, LD_{50} (rat) 440 mg/kg. It is used in a number of ways including as antioxidants.

3. Tetrahydro pyranone, probably similar to valeric acid used in plasticizers and probably of moderate although smelly toxicology. It is rather an unusual chemical and maybe a result of complex organic interactive reactions of materials in the Carstab dumpings.

4. Cyclohexanone, CO $(CH_2)_4$ CH_2, LD_{50} (rat) 1620 mg/kg is used in a variety of organic synthesis reactions and is a moderately toxic ketone.

5. Tentatively identified as another major constitutient is benzoyl aniline or benzanilide $C_{14}H_{13}N$-O?, another unusual organic synthesis compound.

6. 2-Cyclohexylidine cyclohexanone another ketone of unknown toxicity.

7. Phthalic acid, diisooctylester, (DIOP) $(C_8H_{17}COO)_2C_6H_4$, of low toxicity used many resins, plastics and rubbers.

There are also a number of Alcohols and Ketones used in resins, etc., and some other compounds, some of which are very unusual and uncommon. I also note a low level peak of 3 (phenylamino) propanenitrile which is a cyano / cyanide type compound of fairly high toxicity. Also note scan #2311 tripheny phosphinoxide of moderate toxicity, but a very unusual compound used primarily in resins, stabilizers, and probably in Grignard reactions.

Conclusion: Serious contamination of Mill Creek by organic chemicals results from unknown specific sources in all likelihood on the Carstab property.

Plan of Action: Results were informally discussed with wastewater LSC members 7-16-80 and other OEPA employees in the last 1-2 days. Bill Borrow of SWDO, OLPC is scheduling a meeting with Carstab tentatively 7-30-80 to discuss the results and discuss possible remedial measures with Carstab. Among the possible items to be discussed at that meeting are such things as recovery wells, containment and treatment trenches and further sampling to determine the source(s) of contamination.

I would suggest a news release after we have discussed possible solutions with the company on 7-30-80. You will be kept updated as events progress.

KMH/sg

cc: Tom Winston/Bill Barrow, SWDO, OLPC
Jennifer Tiell, Legal
Ed Glod/Roger Hannahs, OLPC, CO
Elmer Rehme, SWDO, IWW
Kenneth Schultz/Mike Dalton, ER, CO
Miles Datesman, ER, SWDO
Bob Phelps, IWW, CO
Dr. Kenneth Applegate, PWS, CO
Debbie Edwards, Special Assistant to the Director
Al Franks, PIC

Mpca

Ohio EPA

Thiokol/Carstab Corporation
West Street
Cincinnati, Ohio 43215

September 28, 1981

Attention: Carl Adams

Dear Mr. Adams:

In July 1980, representatives of the Ohio EPA met with you and other Carstab officials to discuss the leachate problem along Mill Creek. The result of the meeting was that your company agreed to hire a geologic consulting firm to determine the source of the leachate and a method of preventing the leachate from polluting Mill Creek or other state waters. Since then, Ohio EPA has received a copy of Pedco's proposal and borings have been made according to that plan. No results from the borings have been received, however, and the preventive action which was to be developed from the study has not been initiated.

In order to avoid any further delays in resolving this serious problem, I am requesting that the report from the Pedco study and the recommended action be sent to Ohio EPA within two weeks. We will review the study and the recommended action and give our approval or recommendations for modifications within thirty days of receiving them. It will then be possible to implement the plans before freezing weather.

Please address all questions and correspondence in this matter to me or Mr. David Strayer, Group Chief, Hazardous Materials Management, Southwest District Office.

Sincerely,

Michael Dalton

Michael Dalton, Geologist
Emergency Response

MD/gc

West Street
Cincinnati, Ohio 45215
513 / 733-2100

Thiokol/CARSTAB CORPORATION

October 16, 1981

State of Ohio Environmental Protection Agency
Box 1049
361 East Broad Street
Columbus, Ohio 43216

Attention: Mr. Michael Dalton,
Geologist, Emergency
Response

Dear Mr. Dalton:

This will acknowledge your letter of September 28, 1981 concerning the Mill Creek leachate study.

To provide you with a status report, the company has received several draft study reports from its consultant. The latest, which was identified as the "final" report, was sent to us only last month, and is still being reviewed within the company. Preliminarily, we are not satisfied that the report contains enough information or analysis to allow any conclusions to be drawn.

As soon as our review of the report is completed, we intend to define the remaining tasks necessary to finish the study, and to arrange for the performance of those tasks. We will then be in a position to conduct further discussions with you on this subject.

Very truly yours,

C. L. Adams

C. L. Adams
Plant Engineer

CLA:jj

Thiokal/ Carstab Corporation
West Street
Cincinnati, Ohio 45215

November 3, 1981

Attn: Carl Adams

Dear Mr. Adams:

I have discussed your reply to my letter of September 28, 1981 with Mr. Ken Harsh and Mr. Ken Schultz, assistant chief and chief of Emergency Response, and with Mr. David Strayer, acting group chief of Hazardous Materials Management, Southwest District Office. We all concur that the reply is not adequate.

The fact that your company has required redraftings of Pedco's reports is disturbing to us. You indicate in your reply that these are the reports on the hydrogeologic conditions and not the proposals to remedy the problem. If the reports are inadequate to determine the best method of control we can understand the need for further data, however, the over-riding concern is determining the extent of contamination and the possible impact on nearby water users.

Due to the inordinate length of time which has passed since your company was requested to undertake the study, it has been decided that agency personnel should review the data accumulated to date and make the determination as to its adequacy or inadequacy. You are therefore required, under Section 6111.03 (f) of the Ohio Revised Code, to send copies of all reports, plans, and data submitted by Pedco, or any other consultants or corporate staff, in regard to the source, extent, or control of the ground water pollution existing under or near your chemical facility on West Street in Reading, Ohio to this office with ten (10) working days of receipt of this letter.

As soon as Ohio EPA personnel have reviewed the material we will meet with your staff to discuss the necessary control measures. It is our hope to see the necessary actions completed before spring 1982.